

KING & SPALDING LLP

MICHAEL J. SHEPARD (SBN 91281)

mshepard@kslaw.com

50 California Street, Suite 3300

San Francisco, CA 94111

Telephone: +1 415 318 1200

Facsimile: +1 415 318 1300

KERRIE C. DENT (Admitted *pro hac vice*)

kdent@kslaw.com

1700 Pennsylvania Avenue, NW, Suite 900

Washington, DC 20006-4707

Telephone: +1 202 626 2394

Facsimile: +1 202 626 3737

Attorneys for Defendant

ROWLAND MARCUS ANDRADE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiffs,

v.

ROWLAND MARCUS ANDRADE,

Defendants.

Case No. 3:20-CR-00249-RS-LBx

**DECLARATION OF KERRIE C. DENT IN
SUPPORT OF DEFENDANT ROWLAND
MARCUS ANDRADE'S MOTION TO
REMOVE INCORRECTLY FILED
DOCUMENT FROM THE DOCKET**

Hon. Laurel Beeler, Magistrate Judge

1 I, Kerrie C. Dent, declare:

2 1. I am an attorney at King & Spalding LLP, admitted pro hac vice to practice before
3 this Court.

4 2. I am one of the attorneys of record for defendant Rowland Marcus Andrade in the
5 above-captioned case.

6 3. I have personal knowledge of the following facts, and if called as a witness in this
7 matter, I could competently testify to the matters stated in this Declaration.

8 4. I was involved in preparation of Defendant's Motion to Compel Discovery.
9 When we filed that motion (Docket #115) on November 23, 2022, we inadvertently included
10 exhibits that were intended to be filed under seal.

11 5. We immediately took steps to remedy the error, first by notifying the Government
12 of the error and informing the Government that a corrected filing would be filed promptly. The
13 Government's attorneys agreed to refrain from reviewing that document, and to destroy any
14 copies. Despite the unavailability of most court personnel over the Thanksgiving holiday
15 weekend, we were able to reach a member of the court staff, who was able to lock-down the
16 document; that is, to remove the filing from public view.

17 6. We refiled the Motion to Compel Discovery and attachments on November 28,
18 2022.

19 7. We are now requesting that the Court remove from the ECF system Defendant's
20 Motion to Compel, and attachments, that were incorrectly filed on November 23, 2022 (Docket
21 #115).

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct. Executed on November 30, 2022 at Washington, District of Columbia.

24
25 /s/ Kerrie C. Dent

26 Kerrie C. Dent
27
28